

In re Patent Application of:

VINSON ET AL.

Serial No. **09/915,762**

Filing Date: **July 26, 2001**

REMARKS

Claims 1-8, 19-21, 23-28 and 31 remain in this application. Claims 9-18, 22, 29, 30 and 32-37 have been cancelled. Claims 1, 8 and 19 have been amended.

Applicants thank the Examiner for the detailed study of the application and prior art. At the outset, Applicants have cancelled claims that had been withdrawn from consideration because those withdrawn claims were considered non-elected claims and drawn to a metallized carrier.

Applicants also submit new drawing sheets for FIGS. 1 and 2 with corrections to add the legend "PRIOR ART" to FIG. 1, the substrate reference numeral "12" to FIGS. 1 and 2, and the reference numeral "18" to FIG. 2.

The present Amendment also corrects inconsistencies in the claims as set forth in the Examiner's Office Action. The term "at least one" has been added before "decoupling capacitor assembly."

Applicants submit a Declaration Under 37 CFR Section 1.131 from the inventors that conclusively shows that the inventors conceived and reduced to practice the present claimed invention prior to March 30, 2001, the effective date of U.S. Patent No. 6,441,483 to Akram. The 131 Declaration and exhibits show that the inventors reduced to practice an integrated circuit chip module comprising a substrate, integrated circuit die with the die pads and the substrate bonding pads, and a decoupling capacitor assembly with the capacitor carrier, decoupling capacitor and wire bonds extending from the decoupling capacitor assembly to the die pads and from the die pads to the substrate bonding pads.

In re Patent Application of:

VINSON ET AL.

Serial No. **09/915,762**

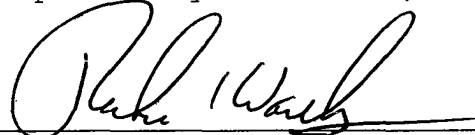
Filing Date: **July 26, 2001**

As to the cited U.S. Patent No. 6,284,985 to Naba et al. (hereinafter "Naba"), it discloses a ceramic circuit board that can be formed from different materials, but nowhere suggests the present claimed invention of the decoupling capacitor assembly having the capacitor carrier and decoupling capacitor. Indeed, at most, Naba suggests the use of semiconductor elements arranged on a metal circuit plate that can be formed of different materials and arranged to be free from short-circuit resulting from solder flow or bonding defects.

Applicants contend that the present case is in condition for allowance and respectfully requests that the Examiner issue a Notice of Allowance and Issue Fee Due.

If the Examiner has any questions or suggestions for placing this case in condition for allowance, the undersigned attorney would appreciate a telephone call.

Respectfully submitted,



RICHARD K. WARTHER

Reg. No. 32,180

Allen, Dyer, Doppelt, Milbrath
& Gilchrist, P.A.

255 S. Orange Avenue, Suite 1401

Post Office Box 3791

Orlando, Florida 32802

Phone: 407-841-2330